ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Amendment of Parts 2 and 15 of the	)	
Commission's Rules to Further Insure	)	ET Docket No. 98-76
that Scanning Receivers Do Not	)	
Receive Cellular Radio Signals	)	

ADDENDUM TO PETITION FOR (PARTIAL) RECONSIDERATION

Introduction

1. Uniden America Corporation (hereinafter "Uniden"), filed a Petition for (Partial) Reconsideration to the Commission's REPORT AND ORDER ("Order") in the above-captioned proceeding, FCC 99-58 on April 27, 1999. Subsequent to this filing, Uniden found an apparent misstatement in the APPENDIX C of the Order. The words "38 dB or higher" should be replaced by the words " at least 38 dB".

Discussion

2. For reference purposes, the new Section 15.121(b) in the Order reads:

> **(b) Except as provided in paragraph (c) of this section, scanning receivers shall reject any signals from the Cellular Radiotelephone Service frequency bands that are 38 dB or higher based upon a 12 dB SINAD measurement which is considered the threshold where a signal can be clearly discerned from any interference that may be present.**

3. By careful examination of the above wording, Uniden noticed that the required rejection is in reverse order from what is intended in Uniden's original Petition for Rulemaking and the Commission's Notice of Proposed Rulemaking. In other words, signals from the

Cellular Radiotelephone Service should only be rejected if the signal strength is **38 dB or higher** from the receiver's minimum discernible signal based upon the 12 dB SINAD measurement method.

4. The 38 dB rejection specification, which was first proposed by Uniden in its Petition for Rulemaking, was based upon the judgment that with normal design practice, Cellular Radiotelephone Service signals would not be capable of being detected by a scanning receiver within the normal service area of a particular cellsite transmitter unless the receiver was in an extremely close proximity to the transmitting apparatus. At very close distances, which would be considered unlikely, the field strength of the cellsite emissions may exceed the level to which the 38 dB standard will effectively reject or otherwise curb the reception of these signals. However, using standard analog frequency modulation techniques, it is unlikely that any frequency modulated receiver would reject these signals in a very close geographical proximity to a cellsite transmitter.

5. It is apparent that the Commission intended that scanning receivers reject the Cellular Radiotelephone Service signals within the normal operational range of the cellsite transmitter in which the emission levels are **at or below the rejection level**. In typical scanning receivers, the 12 dB SINAD measurement equates to about .5 microvolts, the threshold of the minimum discernible sensitivity at the antenna input port. It is assumed that receiver sensitivity will be tested at the closest tunable frequency to the Cellular Radiotelephone Service frequencies and must reject the 800 MHz cellular signals up to the 38 dB level, which equates to 40 microvolts at the base of the antenna.

6. In order for manufactures to design and certify scanning receivers that meet the

Commission's intended rulemaking, Uniden proposes that the new Section 15.121(b) be changed to read as follows:

> **(b) Except as provided in paragraph (c) of this section, scanning receivers shall reject any signals from the Cellular Radiotelephone Service frequency bands that are at least 38 dB based upon a 12 dB SINAD measurement which is considered the threshold where a signal can be clearly discerned from any interference that may be present.**

Summary

7. It is obvious that a typographical error resulted in the wrong word, or possibly a symbol in the reference to 38 dB. Uniden believes that with the changes suggested in this document will solve this matter, and along with our earlier filed Petition for (Partial) Reconsideration, if enacted, will result in clear rules which will virtually eliminate the interception of Cellular Radiotelephone Service signals by scanning receivers.

Respectfully submitted,

UNIDEN AMERICA CORPORATION

By: _____

James R. Haynes
Vice President, Engineering and Regulatory Affairs

Uniden Engineering Services
216 John Street
P.O. Box 580
Lake City, South Carolina 29560
Tel. (843) 394-3852
Fax (843) 394-8393
Email jhaynes@uniden.com

By: _____

Gregg P. Skall
Its Attorney

Pepper & Corazzini, L.L.P.
1776 K Street, N.W., Suite 200
Washington, D.C. 20006
Tel: (202) 296-0600
Fax: (202) 296-5572
Email: gps@commlaw.com

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